

days of the date of receipt by service or otherwise of a copy of the initial pleading by defendant.

The time for the defendant to answer or otherwise respond to the Complaint has not expired.

3. This Court has original subject matter jurisdiction over this action pursuant to 28 U.S.C. § 1332, in that the parties are of diverse citizenship and the matter in controversy is alleged to exceed \$75,000.00, exclusive of interest and costs.

4. Plaintiffs are citizens of the State of Tennessee.

5. Defendant is a corporation incorporated under the laws of the State of Minnesota having its principal place of business in the State of Minnesota.

6. The amount in controversy exceeds \$75,000.00, exclusive of interest and costs.

7. The above-described action is one which may be removed to this Court by defendant pursuant to the provisions of 28 U.S.C. §§ 1441 and 1446.

8. Concurrent with the filing and service of this Notice of Removal, defendant has served a Notice of Filing Notice of Removal upon plaintiffs and upon the Clerk of the Circuit Court for Hamilton County, Tennessee, for filing in this action, together with a copy of this Notice of Removal.

WHEREFORE, defendants pray that this action now pending in the Circuit Court for Hamilton County, Tennessee be removed to the United States District Court for the Eastern District of Tennessee, Chattanooga Division for all further proceedings.

/s/ William B. Jakes, III

WILLIAM B. JAKES, III, #10247

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Attorneys for Defendant Cedar Lake d/b/a

Ashland Gardens Apartments

CERTIFICATE OF SERVICE

I certify that I have served a copy of the foregoing by postage prepaid, U.S. Mail upon the following:

Ryan M. Womack
Warren & Griffin, P.C.
736 Georgia Avenue, Suite 600
Chattanooga, TN 37402

this the 27th day of November, 2017.

/s/ William B. Jakes, III

WILLIAM B. JAKES, III